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Cover Letter to the Clerk of Court

2025 SEP 24 AM 2: 38

CLERK
US BANKRUPTCY COURT
PISTRICT OF DELAWARE

September 23, 2025

Clerk of Court - Intake

United States Bankruptcy Court for the District of Delaware

824 North Market Street, 3rd Floor

Wilmington, DE 19801

Re: In re FTX Trading Ltd., et al., Case No. 22-11068 (KBO) — SUPPLEMENTAL EMERGENCY MOTION OF HEJIA ZHAO (PRO SE) TO CONFIRM INCLUSION IN SEPTEMBER 30, 2025 DISTRIBUTION

AND MOTION FOR SHORTENED NOTICE UNDER L.R. 9006-1(e)

Dear Clerk:

Enclosed for filing please find the Supplemental Emergency Motion of Hejia Zhao (pro se), and Motion for Shortened Notice, together with the Proposed Order, Certificate of Service, and List of Exhibits to Be Attached by Movant. I respectfully request expedited docketing in light of the imminent September 30, 2025 distribution date.

Respectfully,

Hejia Zhao (pro se)

IN THE UNITED STATES BANKRUPTCY COURT

2025 SEP 24 AM 2: 39

FOR THE DISTRICT OF DELAWARE

CLERK
US BANKRUPTCY COURG
DISTRICT OF DELAWARE

In re:

FTX Trading Ltd., et al.,

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

SUPPLEMENTAL EMERGENCY MOTION OF HEJIA ZHAO (PRO SE) TO CONFIRM INCLUSION IN SEPTEMBER 30, 2025 DISTRIBUTION

(Related to D.I. 32384 and Emergency Motion served Sept. 22, 2025)

Movant Hejia Zhao (the "Movant"), appearing pro se and identified in the Debtors'/Trust's records as Customer Code 2696746, respectfully submits this Supplemental Emergency Motion (the "Motion") to confirm Movant's inclusion in the September 30, 2025 distribution (the "Distribution") via Kraken (Movant's selected Distribution Service Provider). This Motion supplements the Emergency Motion served on September 22, 2025 (D.I. pending) and relates to Movant's prior motion at D.I. 32384.

I. RELIEF REQUESTED

Movant requests entry of an order, substantially in the form submitted herewith, immediately confirming that Movant (Customer Code 2696746) will be included in the Distribution scheduled for September 30, 2025 via Kraken. Given the imminent date and Movant's completed compliance with all prerequisites, there is no time left for voluntary action by the FTX Recovery Trust.

II. JURISDICTION AND BASIS

This Court has jurisdiction under 28 U.S.C. §§ 157 and 1334; venue is proper under 28 U.S.C. §§ 1408–1409. This is a core proceeding under 28 U.S.C. § 157(b). Relief is authorized by 11 U.S.C. §§ 105(a), 1142(b), and the Court's inherent authority to administer plan distributions.

III. SUPPLEMENTAL FACTS

- 1. Movant is a Class 5A customer and selected Kraken as her DSP; she completed KYC verification, tax documentation, and Kraken onboarding on or before August 7, 2025. FTX Support acknowledged that all steps were correctly completed and linked.
- 2. As of September 22, 2025, Movant's FTX Customer Claim Portal still reflects a "Disputed"

status for the Distribution.

- 3. From September 20–22, 2025, similarly situated creditors (e.g., Chinese passport with non-PRC tax residency; Kraken DSP) received dashboard updates and distribution confirmations; Movant received none.
- 4. Multiple inquiries to FTX Support/Kroll yielded only form responses; emails to Trust counsel went unanswered.
- 5. Absent immediate Court relief, Movant risks erroneous exclusion from the September 30 Distribution, causing irreparable prejudice.

IV. ARGUMENT

The requested order is narrow and ministerial. Movant has satisfied every prerequisite yet remains flagged as "Disputed" without explanation, while similarly situated creditors have been cleared. Sections 105(a) and 1142(b) empower the Court to enforce plan implementation and ensure equal treatment among creditors. Immediate confirmation of Movant's inclusion will prevent an unjust omission and imposes no undue burden.

WHEREFORE, Movant respectfully requests entry of the proposed Order confirming her inclusion in the September 30, 2025 distribution via Kraken, and such other relief as is just and proper.

Dated: September 23, 2025

Hela Zhas

Hejia Zhao (pro se)

DECENTED

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE 2025 SEP 24 AM 2: 39

In re:

FTX Trading Ltd., et al.,

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

MOTION TO SHORTEN NOTICE PERIOD FOR SUPPLEMENTAL EMERGENCY MOTION

Movant Hejia Zhao respectfully moves for entry of an order shortening notice for the Supplemental Emergency Motion, fixing the objection deadline at September 24, 2025 at 12:00 p.m. (Eastern Time), so that the Court may consider the Motion on an emergency basis and permit Movant to file a consolidated Certificate of No Objection on September 25, 2025 if unopposed.

Cause exists to shorten notice: the Distribution occurs September 30, 2025; Movant completed all prerequisites by August 7, 2025; similarly situated creditors already received confirmations; and informal outreach yielded only templates or no response. Shortened notice prevents irreparable prejudice and needless motion practice.

Dated: September 23, 2025

Hejia Zhao (pro se)

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In	ro
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FTX Trading Ltd., et al.,

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

[PROPOSED] ORDER GRANTING SUPPLEMENTAL EMERGENCY MOTION OF HEJIA ZHAO FOR INCLUSION IN SEPTEMBER 30, 2025 DISTRIBUTION

Upon the Supplemental Emergency Motion of Hejia Zhao (pro se) (the "Movant"), dated September 23, 2025, seeking immediate confirmation of Movant's inclusion in the September 30, 2025 distribution (the "Distribution"), and it appearing that good cause exists for the relief requested, IT IS HEREBY ORDERED THAT:

- 1. The Supplemental Emergency Motion is GRANTED.
- 2. The FTX Recovery Trust shall include Movant (Customer Code 2696746) in the Distribution scheduled for September 30, 2025 via Kraken, and shall take all necessary actions to ensure Movant's distribution is processed contemporaneously with other Class 5A creditors.
- 3. The Trust shall promptly update Movant's status on the FTX Customer Claims Portal to reflect approval for the September 30, 2025 Distribution.
- 4. The Court retains jurisdiction to interpret and enforce this Order.

Dated:, 2025				
Wilmington, Delaware				
The Honorable Karen B. Ov	vens			
United States Bankruptcy J	udge			

IN THE UNITED STATES BANKRUPTCY COURT FOR EIVED

FOR THE DISTRICT OF DELAWARE 2025 SEP 24 AM 2: 39

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARI

In re:

FTX Trading Ltd., et al.,

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2025, I caused true and correct copies of the Supplemental Emergency Motion, Motion to Shorten Notice, Proposed Order, and this Certificate of Service to be served by email upon the following:

U.S. Trustee - District of Delaware:

- Juliet M. Sarkessian juliet.m.sarkessian@usdoj.gov
- Benjamin A. Hackman benjamin.a.hackman@usdoj.gov
- David Gerardi david.gerardi@usdoj.gov

Counsel to the FTX Recovery Trust - Sullivan & Cromwell LLP:

- Andrew G. Dietderich dietdericha@sullcrom.com
- James L. Bromley bromleyj@sullcrom.com
- Brian D. Glueckstein gluecksteinb@sullcrom.com
- Alexa J. Kranzley kranzleya@sullcrom.com

Delaware Counsel to the Trust - Landis Rath & Cobb LLP:

- Adam G. Landis landis@lrclaw.com
- Kimberly A. Brown brown@lrclaw.com
- Matthew R. Pierce pierce@lrclaw.com
- Matthew B. McGuire mcguire@lrclaw.com

By this certificate and the cover email, Movant requests consent to email service for the foregoing papers. If any party withholds consent or the Court requires alternate service, Movant will promptly effect service consistent with FRBP 7004/9014.

Dated: September 23, 2025

Hejia Zhao (pro se)

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

FTX Trading Ltd., et al.,

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

EXHIBIT INDEX

Exhibit A – Screenshot of Movant's FTX Customer Claim Portal marked "Disputed" (on Sept. 23, 2025)

Exhibit B – Screenshot of similarly situated creditors' claim portals showing updated distribution amounts (on Sept. 22, 2025)

Exhibit C – Email from FTX Support confirming completion of KYC verification, tax documentation, and Kraken DSP linking (dated on/before Aug. 7, 2025)

Exhibit D — Email from Kraken confirming DSP onboarding (dated on/before Aug. 7, 2025)

Exhibit E – Copies of Movant's recent emails to FTX Recovery Trust counsel (no response received)

Exhibit F – Recent email threads to FTX support showing non-substantive/template responses

Exhibit A – Screenshot of Movant's FTX Customer Claim Portal marked "Disputed" (on Sept. 23, 2025)

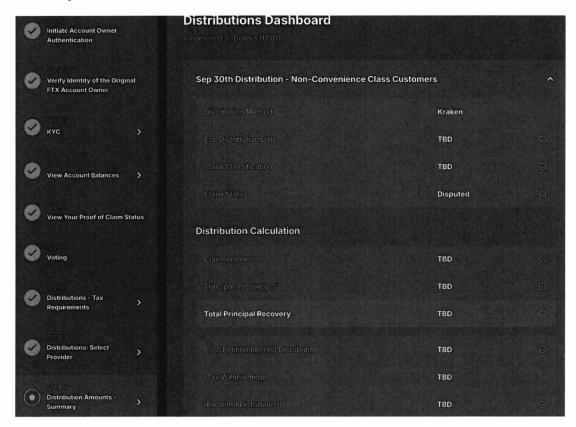


Exhibit B – Screenshot of similarly situated creditors' claim portals showing updated distribution amounts (on Sept. 22, 2025)



Exhibit C - Email from FTX Support confirming completion of KYC verification, tax documentation, and Kraken DSP linking (dated on/before Aug. 7, 2025)

Shandie (Please use support.ftx.com)

Jul 31, 2025, 02:18 PDT

Hi there.

Just got information from our KYC team that your residential address has already been updated.

As for your Step 8, once you have onboarded with a Distribution Service Provider, this selection cannot be changed. You can find more Distribution information here: https://support.ftx.com/hc/en-us/articles/33190623459092-General-Information-on-Distribution-Service-Providers

Thank you.

FTX Customer Support

Sherry Zhao <hz263@cornell.edu>

Aug 7, 2025, 10:55 PM 🚓

to FTX 🕶

Thank you for your response. I received confirmation from Kraken that my KYC and linking to FTX is properly done. However on my Step 9 dashboard it's still showing May 30 distribution info, would this be updated to Sep 30 distribution soon? Thanks!

Hejia



Jason Gunn (Please use support.ftx.com)

Aug 7, 2025, 17:52 PDT

Please continue to monitor the FTX Claims Portal, the dates will udate once everything is confirmed

Kindly check Step 9 for your Est. Distribution Date, the Court-approved Chapter 11 Plan of Reorganization (the "Plan") became effective on January 3, 2025.

For more information regarding Distributions, please refer to https://support.ftx.com/hc/en-us/articles/33190623459092-General-Information-on-Distribu Service-Providers

If you have completed Steps 3 to 8, the next step is to wait for updates regarding your distribution.

Thank you,

Exhibit D — Email from Kraken confirming DSP onboarding (dated on/before Aug. 7, 2025)

Confirmation and Next Steps - Upcoming FTX distribution (External) Indox ×

Kraken <no-reply@email.kraken.com> Unsubscribe

Thu, Aug 7, 9:21 PM

mkraken

Hi Hejia,

We're grateful that you've chosen Kraken as your preferred platform for receiving funds related to the FTX distribution.

Here's where we are in the process:

- Vou've created your Kraken account
- Vour Kraken and FTX accounts have been successfully linked
- Vour Kraken account is properly verified
- \bullet $\ensuremath{\mathbb{Z}}$ All that's left is to wait for FTX to distribute the funds

In terms of timeline and when to expect FTX to distribute the funds, updates will be posted on the FTX Claims Portal and on the @FTX_Official X account as soon as the information is available.

Exhibit E - Copies of Movant's recent emails to FTX Recovery Trust counsel (no response received)

Courtesy Notice re D.I. 32384; Order D.I. 32720 — Request to Confirm Inclusion of Customer Code **8 2** 2696746 in 9/30 Distribution D Sherry Zhao <hz263@cornell.edu> Sun, Sep 21, 12:34 AM (1 day ago) ☆ ← : to pierce, brown, landis, kranzleya, dietdericha, gluecksteinb, bromleyj, juliet.m.sarkessian, david.gerardi, benjamin.a.hackman 🔻 Counsel for the FTX Recovery Trust: This is a courtesy notice that I filed D.I. 32384 (attached). The Court entered Order D.I. 32720 ("Order Setting Status Conference," entered Sept. 16, 2025), setting a status conference for October 23, 2025 and listing my filings as related. I am a pro se Class 5A customer (Customer Code 2696746). I completed the record-date prerequisites—KYC, tax form, and DSP onboarding with Kraken—on or before August 15, 2025, confirmed by both FTX support and Kraken. I understand that certain FTX customers with Chinese passports and Hong Kong tax residency received an email titled "FTX Recovery Trust - Completed Distribution to DSP" on September 20, 2025, confirming inclusion in the September 30, 2025 distribution. Their Kraken accounts also confirm that "the funds have successfully been distributed from FTX to Kraken." I have not yet received a similar confirmation. Request: Please confirm by September 22, 2025, 5:00 p.m. ET that Customer Code 2696746 is queued for the September 30, 2025 distribution via ordinary DSP mechanics. If not, please identify any specific unmet record-date requirement or legal bar so that I can cure promptly; I will provide any documentation you require. If I do not receive a response by the deadline above, I will promptly seek appropriate relief from the Court to safeguard inclusion in this distribution. FTX (22-11068-KBO) — Emergency Motion & Shortened Notice; Request for Confirmation of 🌼 🖨 🗵 9/30 Distribution (Customer Code 2696746) External > Inbox x Sherry Zhao <hz263@cornell.edu> to dietericha, bromleyj, gluecksteinb, kranzleya, landis, brown, pierce, mcguire, juliet.m.sarkessian, benjamin.a.hackman, david.gerardi 🕶

I write regarding In re FTX Trading Ltd., et al., Case No. 22-11068 (KBO). I am a Class 5A customer (Customer Code 2696746) proceeding pro se.

This morning I filed and served an Emergency Motion to Confirm Eligibility for the September 30, 2025 Distribution and Motion for Shortened Notice under Local Rule 9006-1(e) (related to D.I. 32384). The motion requests that the FTX Recovery Trust file a notice by September 24, 2025 at 12:00 p.m. Eastern confirming that Customer Code 2696746 is included in the September 30 distribution via Kraken. If no objection is filed by that deadline, the motion asks the Court to grant the relief on the papers without a hearing.

As noted in the motion, all distribution prerequisites were completed by August 6, 2025 (KYC, tax form, and Kraken DSP onboarding), with confirmations from FTX Support and Kraken. I therefore request a written confirmation today or tomorrow that the Trust will include Customer Code 2696746 in the 9/30 distribution and, if you are able, that you will file a short docket notice to that effect before the 9/24 noon ET deadline.

If the Trust does not intend to confirm inclusion, please state that position on the docket by the deadline so I can proceed appropriately. Under L.R. 9013-1(I), if no objection is filed, I will proceed with a Certificate of No Objection (Local Form 107) after 24 hours in accordance with the rules.

For efficiency, if you do not object to the relief, I would appreciate it if you would upload the proposed order after the CNO is submitted, consistent with the Court's Electronic Order Processing procedure (I am pro se and do not have CM/ECF upload access).

Finally, please confirm consent to service by email for this motion and any related papers. If you do not consent, advise immediately so I can effect alternate service consistent with FRBP 7004/9014 and the Local Rules. (The motion includes the standard "Request for Consent / Reservation" language.)		
Thank you for your prompt attention to this time-sensitive matter.		
Respectfully,		
Hejia Zhao (pro se)		
Attachments:		
Emergency Motion + Motion to Shorten Notice		
Proposed Order Certificate of Service		
3. Certificate of Service		
One attachment • Scanned by Gmail ①		
Secretary to Constitute Secretary Type Constitute Secretary Type S		
Section SEC SECTION SE		
HejlaZhao_Emerg		
Sherry Zhao <hz263@cornell.edu> Sep 23, 2025, 4:49 PM (7 hours ago) 🔆 👆 to bromleyj, gluecksteinb, kranzleya, landis, brown, pierce, mcguire, juliet.m.sarkessian, benjamin.a.hackman, david.gerardi, dietdericha 🔻</hz263@cornell.edu>		
Counsel for the FTX Recovery Trust:		
I write regarding In re FTX Trading Ltd., et al., Case No. 22-11068 (KBO). I am a Class 5A customer (Customer Code 2696746), pro se.		
Yesterday I served my Emergency Motion to Confirm Eligibility for the September 30 Distribution and Motion for Shortened Notice under L.R. 9006-1(e) (related to D 32384). The motion requests a date-certain response by Sept. 24, 2025 at 12:00 p.m. ET confirming my inclusion in the 9/30 distribution via Kraken. If no objection is filed by that deadline, the motion asks that the Court grant relief on the papers.		
All record-date prerequisites (KYC, tax form, Kraken onboarding, sanctions screen) were completed on or before Aug. 7, 2025 (confirmations attached). My portal still show: "Disputed." Other similarly situated creditors have received "Completed Distribution to DSP."		
Respectfully, the current process appears opaque—functioning as a *black box*—because similarly situated creditors receive distributions while I receive only template responses and no individualized explanation. This lack of transparency risks unequal treatment of creditors and undermines confidence in the fairness of the distribution mechanics.		
Please either (a) file a short docket notice today or tomorrow confirming my inclusion for the 9/30 distribution, or (b) file any objection by the 9/24 noon ET deadline. If no objection appears, I will file a Certificate of No Objection 24 hours after the deadline consistent with L.R. 7007-4 / 9013-1(i) and ask the Court to enter the proposed order.		
If you do not object, I would appreciate your uploading the e-order when appropriate, per the Court's Electronic Order Processing guidance (I am pro se without CM/ECF upload rights).		
Kindly confirm today that this has been escalated to the reconciliation/ops owner and that a written confirmation will be filed on the docket.		
Respectfully,		
Hejia Zhao		

Exhibit F - Recent email threads to FTX support showing non-substantive/template responses

D	me, FTX 2	Inbox Request to confirm inclusion in Sept 30, 2025 distribution — Customer Code 2696746 (DSP: Kraken) - 0	1:57 AM
20	me, FTX 6	Inbox Request to confirm inclusion in Sept 30, 2025 distribution — Customer Code 2696746 - Ella (Please	Sep 21
>	me, FTX, FTX 16	Inbox Request to confirm inclusion in Sept 30, 2025 distribution — Customer Code 2696746 (DSP: Kraken) - `	Sep 21
D	FTX Support	Inbox [Request received] - To add additional comments, reply to this email. This email is a service from Ple	1:59 AM
D	FTX Support	Inbox [Request received] - To add additional comments, reply to this email. This email is a service from Ple	Sep 21

FTX Trading Ltd. to me 🕶

5:25 AM (18 hours ago) ☆ ← :

Hejia,

Thank you for your inquiry

Distributions will only be made to allowed claims that have satisfied pre-distribution requirements by the cut-off dates described below

In order to be recognized as a holder of an allowed claim as of the next distribution record date, a creditor must meet the requirements under section 2.1.8 of the confirmed Plan. For the avoidance of doubt, this included the original holder of such claim satisfying the KYC verification requirements, submitting a completed valid tax form (step 7), selecting and successfully onboarding with a distribution service provider (step 8), and passing sanctions screening by August 15, 2025. Failure to have completed these steps by the record date will result in the holder not receiving their distribution on September 30th.

Please continue to follow the FTX Claims Portal for updates on future distributions.

For additional information regarding distribution, please visit the Frequently Asked Questions available at: https://support.ftx.com/hc/en-us.

PLEASE NOTE: Kroll is the appointed claims and noticing agent for FTX Trading Ltd. and 101 affiliated debtors' chapter 11 cases. As such, we are not permitted to provide legal or financial advice. Further, Kroll is not permitted to accept claims via email or fax, and any such information provided via either of these methods will not constitute a claim in these proceedings.

Regards,

Kroll Inquiries www.kroll.com

Ella (Please use support.ftx.com)

Sep 21, 2025, 05:59 PDT

Hey there,

Thank you for reaching out to us. We appreciate your inquiry and apologize for not having an immediate answer right now. You can find updates regarding Distributions on official FTX sources such as @FTX_Official on X, https://support.ftx.com/, and correspondence from official email addresses https://support.ftx.com/hc/en-us/articles/19223337707412-Official-Email-Addresses as they become available.

Thank you for understanding.

Ella (Please use support.ftx.com)

Sep 21, 2025, 02:48 PDT

Hi.

You may have completed steps 3 to 8 of the FTX Customer Portal (completed KYC, submitted your tax form, onboarded with a DSP), however, your claim distribution may be delayed due to a few reasons, such as your application being approved after the cut-off date. This is often due to data reconciliation and is not uncommon. Rest assured that FTX Recovery Trust is actively reviewing all claims.

The next distribution will be scheduled when the August 15, 2025 cut-off date has passed but is currently estimated to be on September 30th, 2025.

Once available, the FTX support article will be updated and an announcement will be made on the @FTX_Official X.com account. If you are eligible for distribution, you will see a date listed in the Distribution date field on Step 9 of your FTX portal.

Thank you,

FTX Customer Support

Ella (Please use support.ftx.com)

Sep 21, 2025, 03:29 PDT

Hi there,

Kindly click on the "i" icon for more information as to why your Distribution Date is marked as TBD.

The next distribution is scheduled on September 30, 2025.

More information can be found here: https://support.ftx.com/hc/en-us/articles/34522100742804-Distributions-Dashboard-FAQs

Thank you,

FTX Customer Support

Ella (Please use support.ftx.com)

Sep 21, 2025, 04:00 PDT

Hi there,

Please note that distributions will only be made to holders of "Allowed" claims that have satisfied pre-distribution requirements by August 15, 2025. The next distribution date is anticipated to be on September 30th, 2025.

If you have completed the pre-distribution requirements, which include satisfying the KYC verification requirements (step 3), submitting a completed valid tax form (step 7), and successfully onboarding with a distribution service provider (step 8) before the cut-off date, then kindly wait for updates.

You can find updates regarding Distributions on official FTX sources such as @FTX_Official on X, https://support.ftx.com/hc/en-us/articles/19223337707412-Official-Email-Addresses as they become available.

 $For more information, please see \underline{https://support.ftx.com/hc/en-us/articles/34522100742804-Distributions-Dashboard-FAQs.}\\$

Thank you,

Ella (Please use <u>support.ftx.com</u>) Sep 21, 2025, 04:15 PDT
Hi there,
You can find updates regarding Distributions on official FTX sources such as @FTX_Official on X, https://support.ftx.com/ , and correspondence from official email addresses https://support.ftx.com/hc/en-us/articles/19223337707412-Official-Email-Addresses as they become available. Please check step 9 from time to time.
Thank you,
FTX Customer Support
Ella (Please use <u>support.ftx.com</u>) Sep 21, 2025, 02:30 PDT
Hello,
If the pre-distribution requirements are not satisfied before the set deadlines, then distribution for your claim may be delayed to a later date. Once available you will see a date listed in the Distribution date field on Step 9.
Pre-distribution requirements include submitting a completed valid tax form (step 7), selecting and successfully onboarding with a distribution service provider (step 8) and passing sanctions screening.
Thank you,
FTX Customer Support
Ella (Please use support.ftx.com) Sep 21, 2025, 06:56 PDT
Hi there,
You can find updates regarding Distributions on official FTX sources such as @FTX_Official on X, https://support.ftx.com/ , and correspondence from official email addresses as they become available.
Thank you,

Extremely Urgent

1.LBS SHP WT: 1.LBS DWT: 15,12,1 DATE: 23 SEP 2025

LI FANGZHENG (626) 426–7298 THE UPS STORE #7710 2224 AVENUE U BROOKLYN NY 11229–3648

SHIP DELAWARE, US BANKRUPICY COURT TO: (302) 252-2900 CASE JUDGE KBO CLERK OF THE COURT 824 N MARKET ST WILMINGTON DE 19801-3024

TRACKING #: 12 C09 9C2 01 3205 3367 UPS NEXT DAY AIR



BILLING: P/P

MMGGAWNDKS4YU ISH 13.00C 22D230 EP 34.5V 08/2025 and notice of institute or studies. Where allowed by low, shipper authorinss UPS is not as forwarding agent for export control and opport conflicts that the commodities, technology or software were exported from the US in accordance with the Export characteristic section (SEOS COTS).